

EXHIBIT “A”

LEGAL DEPT

JAN 11 2022

1/11/2022 - personally
P. Ceruto to served
Dma Brown**LAW OFFICES OF RICHARD A. STOLOFF**605 New Road
Linwood, NJ 08221

(609) 601-2233

BY: RICHARD A. STOLOFF

Attorney ID#: 044951991

ATTORNEY FOR PLAINTIFFS

SANDRA LYNCH & JAMES LYNCH (w/h)

Plaintiffs

vs.

BOARDWALK REGENCY LLC d/b/a CAESARS

ATLANTIC CITY, JOHN DOE INC (1-20),

ABC CORPORATION (1-20),

RICHARD ROE (1-20), j/s/a,

Defendants.

: SUPERIOR COURT OF NEW JERSEY
: ATLANTIC COUNTY-

: LAW DIVISION

: CIVIL ACTION

: DOCKET NO: ATL-L-004086-21

: SUMMONS

From the State of New Jersey to the Defendant(s) named above:**BOARDWALK REGENCY LLC d/b/a CAESARS ATLANTIC CITY**

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it.

(A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.njcourts.gov/forms/10153_deptyclerklawref.pdf.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.njcourts.gov/forms/10153_deptyclerklawref.pdf.

DATE: January 7, 2022

/s/ Michelle Smith

Clerk of the Superior Court

Name of Defendant to Be Served: **BOARDWALK REGENCY LLC**
Address of Defendant to Be Served: **d/b/a CAESARS ATLANTIC CITY**
1900 Boardwalk
Atlantic City, NJ 08401

**Directory of Superior Court Deputy Clerk's Offices
County Lawyer Referral and Legal Services Offices**

ATLANTIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., First Fl.
Atlantic City, NJ 08401

LAWYER REFERRAL

(609) 345-3444

LEGAL SERVICES

(609) 348-4200

BERGEN COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Room 115
Justice Center, 10 Main St.
Hackensack, NJ 07601

LAWYER REFERRAL

(201) 488-0044

LEGAL SERVICES

(201) 487-2166

BURLINGTON COUNTY:

Deputy Clerk of the Superior Court
Central Processing Office
Attn: Judicial Intake
First Fl., Courts Facility
49 Rancocas Rd.
Mt. Holly, NJ 08060

LAWYER REFERRAL

(609) 261-4862

LEGAL SERVICES

(609) 261-1088

CAMDEN COUNTY:

Deputy Clerk of the Superior Court
Civil Processing Office
Hall of Justice
1st Fl., Suite 150
101 South 5th Street
Camden, NJ 08103

LAWYER REFERRAL

(856) 482-0618

LEGAL SERVICES

(856) 964-2010

CAPE MAY COUNTY:

Deputy Clerk of the Superior Court
9 N. Main Street
Cape May Court House, NJ 08210

LAWYER REFERRAL

(609) 463-0313

LEGAL SERVICES

(609) 465-3001

CUMBERLAND COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
60 West Broad Street
P.O. Box 10
Bridgeton, NJ 08302

LAWYER REFERRAL

(856) 696-5550

LEGAL SERVICES

(856) 691-0494

ESSEX COUNTY:

Deputy Clerk of the Superior Court
Civil Customer Service
Hall of Records, Room 201
465 Dr. Martin Luther King Jr. Blvd.
Newark, NJ 07102

LAWYER REFERRAL

(973) 622-6204

LEGAL SERVICES

(973) 624-4500

GLOUCESTER COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
Attn: Intake
First Fl., Court House
1 North Broad Street
Woodbury, NJ 08096

LAWYER REFERRAL
(856) 848-4589
LEGAL SERVICES
(856) 848-5360

HUDSON COUNTY:

Deputy Clerk of the Superior Court
Superior Court, Civil Records Dept.
Brennan Court House--1st Floor
583 Newark Ave.
Jersey City, NJ 07306

LAWYER REFERRAL
(201) 798-2727
LEGAL SERVICES
(201) 792-6363

HUNTERDON COUNTY:

Deputy Clerk of the Superior Court
Civil Division
65 Park Avenue
Flemington, NJ 08822

LAWYER REFERRAL
(908) 236-6109
LEGAL SERVICES
(908) 782-7979

MERCER COUNTY:

Deputy Clerk of the Superior Court
Local Filing Office, Courthouse
175 S. Broad Street, P.O. Box 8068
Trenton, NJ 08650

LAWYER REFERRAL
(609) 585-6200
LEGAL SERVICES
(609) 695-6249

MIDDLESEX COUNTY:

Deputy Clerk of the Superior Court,
Middlesex Vicinage
2nd Floor - Tower
56 Paterson Street, P.O. Box 2633
New Brunswick, NJ 08903-2633

LAWYER REFERRAL
(732) 828-0053
LEGAL SERVICES
(732) 249-7600

MONMOUTH COUNTY:

Deputy Clerk of the Superior Court
Court House
P.O. Box 1269
Freehold, NJ 07728-1269

LAWYER REFERRAL
(732) 431-5544
LEGAL SERVICES
(732) 866-0020

MORRIS COUNTY:

Morris County Courthouse
Civil Division
Washington and Court Streets
P. O. Box 910
Morristown, NJ 07963-0910

LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 285-6911

OCEAN COUNTY:

Deputy Clerk of the Superior Court
118 Washington Street, Room 121
P.O. Box 2191
Toms River, NJ 08754-2191

LAWYER REFERRAL
(732) 240-3666
LEGAL SERVICES
(732) 341-2727

PASSAIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division
Court House
77 Hamilton Street
Paterson, NJ 07505

LAWYER REFERRAL
(973) 278-9223
LEGAL SERVICES
(973) 523-2900

SALEM COUNTY:

Deputy Clerk of the Superior Court
Attn: Civil Case Management Office
92 Market Street
Salem, NJ 08079

LAWYER REFERRAL
(856) 935-5629
LEGAL SERVICES
(856) 691-0494

SOMERSET COUNTY:

Deputy Clerk of the Superior Court
Civil Division
P.O. Box 3000
40 North Bridge Street
Somerville, N.J. 08876

LAWYER REFERRAL
(908) 685-2323
LEGAL SERVICES
(908) 231-0840

SUSSEX COUNTY:

Deputy Clerk of the Superior Court
Sussex County Judicial Center
43-47 High Street
Newton, NJ 07860

LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 383-7400

UNION COUNTY:

Deputy Clerk of the Superior Court
1st Fl., Court House
2 Broad Street
Elizabeth, NJ 07207-6073

LAWYER REFERRAL
(908) 353-4715
LEGAL SERVICES
(908) 354-4340

WARREN COUNTY:

Deputy Clerk of the Superior Court
Civil Division Office
Court House
413 Second Street
Belvidere, NJ 07823-1500

LAWYER REFERRAL
(908) 859-4300
LEGAL SERVICES
(908) 475-2010

LAW OFFICES OF RICHARD A. STOLOFF

605 New Road

Linwood, NJ 08221

(609) 601-2233

BY: RICHARD A. STOLOFF

Attorney ID#: 044951991

ATTORNEY FOR PLAINTIFFS

SANDRA LYNCH & JAMES LYNCH (w/h)

Plaintiffs

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vs.

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BOARDWALK REGENCY LLC d/b/a CAESARS

ATLANTIC CITY, JOHN DOE INC (1-20),

ABC CORPORATION (1-20),

RICHARD ROE (1-20), j/s/a,

Defendants.

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: SUPERIOR COURT OF NEW JERSEY
ATLANTIC COUNTY-

: LAW DIVISION

: DOCKET NO:

: Civil Action

:

: COMPLAINT

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Plaintiffs, Sandra Lynch and James Lynch, residing at 1803 N. Barton Drive, Augusta, GA,

by way of Complaint against the defendants, say:

1. Defendant, Boardwalk Regency LLC d/b/a Caesars Atlantic City, upon information and belief, is a corporation and/or entity and/or business located at 1900 Boardwalk, Atlantic City, NJ 08401, and is qualified to conduct business in the County of Atlantic City, State of New Jersey and at all times material hereto, owned and/or operated and/or leased and/or possessed and/or was in exclusive control of and/or was responsible for the maintenance and/or upkeep and/or safe operation of the premises known as Caesars Atlantic City.

2. Defendant John Doe Inc (1-10), the fictitious name of said defendant, whose true identity is unknown after reasonable investigation, owned and/or operated and/or leased and/or

possessed and/or was in exclusive control of and/or was responsible for the maintenance and/or upkeep and/or safe operation of the premises known as Boardwalk Regency LLC, d/b/a Caesar's Atlantic City, located at 1900 Boardwalk, Atlantic City, NJ 08401.

3. Defendant ABC Corporation (1-10), the fictitious name of said defendant, whose true identity is unknown after reasonable investigation, owned and/or operated and/or leased and/or possessed and/or was in exclusive control of and/or was responsible for the maintenance and/or upkeep and/or safe operation of the premises known as Boardwalk Regency LLC, d/b/a Caesar's Atlantic City, located at 1900 Boardwalk, Atlantic City, NJ 08401.

4. Defendant Richard Roe (1-10), the fictitious name of said defendant, whose true identity is unknown after reasonable investigation, owned and/or operated and/or leased and/or possessed and/or was in exclusive control of and/or was responsible for the maintenance and/or upkeep and/or safe operation of the premises known as Boardwalk Regency LLC, d/b/a Caesar's Atlantic City, located at 1900 Boardwalk, Atlantic City, NJ 08401.

5. At all times material hereto, the defendants acted individually and/or by and through their employees, agents, servants, contractors and/or assigns.

6. On or about January 8, 2020, plaintiff, Sandra Lynch, was lawfully on the premises at, Caesar's Atlantic City, located at 1900 Boardwalk, Atlantic City, NJ 08401 where she was a business invitee/guest of the Caesar's Atlantic City, and while she was in the bathroom of her hotel room, she was caused to slip and fall due to the dangerous and defective condition of the shower

stall, causing a laceration of her hand and fingers as a result of a dangerous condition, consisting of a sharp edge of the shower stall door.

7. The aforesaid occurrences and the injuries which plaintiff was caused to suffer as a proximate result thereof, were caused by the negligence, carelessness, and recklessness of the defendants as aforesaid in that the defendants, individually and/or by and through their employees, agents, workmen, and/or contractors, negligently violated their duty to the plaintiff, including but not limited to:

- a. Carelessly and negligently installed, designed, constructed and/or maintained the shower and shower stall door, creating an unreasonable and dangerous condition of which defendants knew, or should have known.
- b. Knew or should have known that patrons/guests using said shower would likely encounter and be placed at risk due to said dangerous conditions, and more specifically, plaintiff, Sandra Lynch;
- c. Carelessly and negligently failed to warn patrons and more specifically, plaintiff, Sandra Lynch, concerning the dangerous and defective conditions of the shower and shower stall door although defendant knew or, in the exercise of ordinary care, should have known that such a warning was reasonably necessary to prevent injury to patrons using said shower and shower stall door and, more specifically, the plaintiff, Sandra Lynch.

d. Negligently and carelessly failed to create and maintain a safe shower and shower stall door for patrons and more specifically, plaintiff, Sandra Lynch.

e. Failed to hire, employ and/or contract with competent individuals to supervise, control, operate and/or properly install, design, construct or maintain the shower, shower stall and shower stall door; and

f. Negligently and carelessly failed to properly train and/or supervise the individuals, employees, agents, workmen and/or contractors involved in installing, designing, constructing, and/or maintaining the shower, shower stall, and shower stall door in the bathroom.

8. As a direct and proximate result of defendants' negligence, carelessness and recklessness as aforesaid, plaintiff, Sandra Lynch, was caused to suffer and sustain severe, permanent, substantial and painful bodily injuries, some or all of which may be permanent, some or all of which result in severe and serious injuries to bodily function and/or system, causing her to suffer and continue to suffer great pain and embarrassment, all of which have required and will continue to require the expense of money for medical care and treatment and have and will prevent her from attending to business, employment and duties, all of which have resulted a loss of life's pleasures.

WHEREFORE, plaintiff, Sandra Lynch, demands judgment against the defendants Boardwalk Regency LLC, d/b/a as Caesar's Atlantic City, John Doe Inc (1-10), ABC Corporation (1-10) and Richard Roe (1-10), individually, jointly, severally and in the alternative, for damages and cost of suit.

COUNT II

1. Plaintiff, James Lynch, repeats the allegations contained in Count I and makes the same a part hereof by reference thereto.

2. As a result of the negligence, recklessness and carelessness of the defendants, the plaintiff, James Lynch has lost the society and comfort of his wife, Sandra Lynch, and has suffered a loss of consortium.

WHEREFORE, plaintiff, James Lynch, demands judgment on this Count in his favor and against the defendants, Boardwalk Regency LLC, d/b/a as Caesar's Atlantic City, John Doe Inc (1-10), ABC Corporation (1-10) and Richard Roe (1-10) individually, jointly, severally, and in the alternative for damages, together with cost of suit.

Date: <u>December 28, 2021</u>	BY <u>LAW OFFICES OF RICHARD A. STOLOFF</u> <u>/s/Richard A. Stoloff</u> Richard A. Stoloff, Attorney for Plaintiff/s
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DEMAND FOR TRIAL BY JURY
Plaintiff hereby demands a trial by jury as to all issues.

BY <u>LAW OFFICES OF RICHARD A. STOLOFF</u> <u>/s/Richard A. Stoloff</u> Richard A. Stoloff, Attorney for Plaintiff/s

NOTICE PURSUANT TO RULE 1:7-1

Pursuant to Rule 1:7-1, the plaintiff may, at the time of trial, suggest to the trier of fact, with respect to any element of damages, that unliquidated damages be calculated on a time-unit basis.

BY **LAW OFFICES OF RICHARD A. STOLOFF**
/s/Richard A. Stoloff
Richard A. Stoloff, Attorney for Plaintiff/s

CERTIFICATION PURSUANT TO R. 4:5-1

Following my initial review of this matter, it appears that there are no other actions or arbitrations related to this suit pending or presently contemplated.

BY **LAW OFFICES OF RICHARD A. STOLOFF**
/s/Richard A. Stoloff
Richard A. Stoloff, Attorney for Plaintiff/s

DESIGNATION OF TRIAL COUNSEL

Please take notice that pursuant to R. 4:25-4, Richard A. Stoloff, Esquire, is hereby designated as Trial Counsel.

BY **LAW OFFICES OF RICHARD A. STOLOFF**
/s/Richard A. Stoloff
Richard A. Stoloff, Attorney for Plaintiff/s

DEMAND FOR INTERROGATORIES

Demand is hereby made that Defendants answer Form C and C (1) Interrogatories in accordance with the New Jersey Rules.

Date: December 28, 2021 BY **LAW OFFICES OF RICHARD A. STOLOFF**
/s/Richard A. Stoloff
Richard A. Stoloff, Attorney for Plaintiff/s

ATLANTIC COUNTY LAW DIVISION
SUPERIOR COURT OF NEW JERSEY
1201 BACHARACH BLVD
ATLANTIC CITY NJ 08401

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (609) 402-0100
COURT HOURS 8:30 AM - 4:30 PM

DATE: DECEMBER 29, 2021
RE: LYNCH SANDRA VS BOARDWALK REGENCY II C
DOCKET: ATL L -004086 21

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON JOSEPH L. MARCZYK

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 001
AT: (609) 402-0100 EXT 47780.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: RICHARD A. STOLOFF
RICHARD A. STOLOFF
605 NEW ROAD
LINWOOD NJ 08221

ECOURTS